

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CLIFTON BRADLEY,

Plaintiff,

-against-

16 CIV 7043 (RA)

NEW YORK CITY DEPARTMENT OF  
EDUCATION AND DAVID  
FANNING Individually and  
in his Official Capacity,

Defendants.

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**NOTICE OF MOTION TO AMEND**

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**PLEASE TAKE NOTICE** that upon the prior proceeding, along with the Exhibit A, the Memorandum of Law in Support of Plaintiff's Motion to Amend, and all previously filed pleadings and submissions, Plaintiff will respectfully move this Court at a date and time to be set by the Court to amend the complaint pursuant to Rule 15 (a) of the Federal Rules of Civil Procedure and deem the proposed amended complaint served and filed. (Exhibit "A") as leave should be freely granted, and any other relief that is just and equitable.

Dated: New York, New York  
January 9, 2018

Respectfully Submitted,

STEWART LEE KARLIN  
LAW GROUP, PC

s/ Stewart Lee Karlin  
STEWART LEE KARLIN, ESQ.  
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